

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

WILLIAM R. SHAW,

Plaintiff,

v.

Case No. 2:19-cv-1059-WCG

CITY OF MILWAUKEE, CHIEF EDWARD
FLYNN, TERRENCE GORDON,
TIMOTHY A. HAUF, MICHAEL
ANTONIAK, VINCENT ANDRYSCZYK,
THOMAS J. SLOWINSKI, and
KRISTOPHER MADUSCHA,

Defendants.

**PLAINTIFF WILLIAM R. SHAW'S MOTION IN LIMINE NO. 4 TO BAR
DEFENDANTS FROM USING NON-PUBLIC DATABASES TO CONDUCT
BACKGROUND CHECKS ON JURORS AND POTENTIAL JURORS**

Plaintiff William R. Shaw, by undersigned counsel and pursuant to Federal Rule of Civil Procedure 7 hereby moves in *limine* to prohibit Defendants from using non-public or police databases to perform background checks on jurors and potential jurors. These types of background checks “creat[e] an imbalance of information” and other “logistical hurdles” that justify prohibiting such action. *See, e.g., Martinez v. City of Chicago*, No. 14-CV-369, 2016 WL 3538823, at *22 (N.D. Ill. June 29, 2016); *see also Dyson v. Szarzynski*, No. 13 CV 3248, 2014 WL 7205591, at *2–*4 (N.D. Ill. Dec. 18, 2014) (expressing concerns about the practice of performing background checks on jurors during voir dire).

Counsel certifies that no memorandum other supporting papers will be filed with this motion.

Dated: November 8, 2021

/s/ Amy C. Miller
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